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December 3, 2020

VIA ELECTRONIC FILING

Hon. Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Onate v. AHRC Health Care, Inc. and Care Design NY, LLC, No. 20-cv-08292*

Dear Judge Schofield:

My firm represents Defendant Care Design NY, LLC (“CDNY”) in the above-referenced action. Pursuant to this Court’s Individual Rules, I am writing to request a telephonic pre-motion conference on December 17th at 10:50 a.m., which would coincide with the telephonic scheduling conference already scheduled in this matter. (See ECF No. 16).

A single Plaintiff filed this action – Antonio Onate, Jr. – against CDNY and AHRC Health Care, Inc. (“AHRC”). In his Complaint, he admits that he “was originally hired by AHCR on January 27, 2014” but switched to a job at “Care Design on or about July 1, 2018.” (Compl. ¶ 12). He also states that “[t]hroughout his employment, [Mr. Onate] was scheduled to work from 9:00 a.m. until 5:00 p.m., 5 days per week.” (Compl. ¶ 13). He asserts claims against CDNY as an alleged joint employer for the time period from January 2014 to June 2018 and as his primary employer for the period from July 2018 to the end of his employment. Defendant CDNY plans to make a Motion to Dismiss for Failure to State a Claim, or in the alternative, for Summary Judgment for the first time period and a Motion for Summary Judgment for the second time period. The Defendant CDNY proposes a briefing schedule for this combined motion as follows: CDNY will file the motion by January 15th, Plaintiff must file opposition papers by February 12th, and CDNY will reply by February 26th. In accordance with this Court’s Individual Rule III(C)(2), CDNY understands that this letter “stays the time to answer or move until further order of the Court.”

Claims for Time Period from January 2014 to June 2018

CDNY plans to make a Motion to Dismiss for Failure to State a Claim, or in the alternative, for Summary Judgment on Plaintiff’s claim that CDNY was his joint employer from January 2014 to June 2018. In determining whether an entity is a joint employer, courts will evaluate whether the entity “(1) had the power to hire and fire the employees, (2) supervised and controlled employee work schedules or conditions of employment, (3) determined the rate and method of payment, and (4) maintained employment records.” *Velez v. Sanchez*, 693 F.3d 308, 326 (2d Cir. 2012) (quoting *Carter v. Dutchess Comm. College*, 735 F.2d 8, 12 (2d Cir. 1984)). As an initial matter, CDNY did not even exist until April 17, 2017. A copy of the New York State Division of Corporations

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database entry for CDNY is attached as **Exhibit 1**. Additionally, Plaintiff fails to plausibly allege a joint employer relationship. To the contrary, he only makes one factual allegation to justify his joint employment theory – that AHRC “transitioned ‘more than 2,500 people supported and 70 staff to Care Design New York . . .’” (Compl. ¶ 26). However, merely alleging that one entity placed an employee to work at another entity does not make those entities joint employers. *See, e.g., Urena v. Swiss Post Solutions, Inc.*, No. 16-cv-1998, 2016 U.S. Dist. LEXIS 128856, at *9-11 (S.D.N.Y. Sept. 21, 2016) (Schofield, J.) (“None of the allegations in the Complaint would plausibly lead to the conclusion that ASPCA was Plaintiff’s employer under the joint employer doctrine. . . [T]he Complaint contains only two allegations . . . -- that Plaintiff was assigned to work at ASPCA first as an SPS intern, and later as an SPS employee...”). Therefore, Plaintiff has failed to state any plausible claims against CDNY based on a joint employer theory.¹ Additionally, CDNY will make a Motion for Summary Judgment, in the alternative, on this issue, based on evidence demonstrating that CDNY and AHRC are not joint employers.

Claims for Time Period from July 2018 to End of Employment

In his first, second and third claims, Mr. Onate asserts that he did not receive minimum wage and overtime under the Fair Labor Standards Act (“FLSA”) and the New York Labor Law (“NYLL”) based on two theories. (*See* Compl. ¶¶ 3, 59-85). First, Mr. Onate alleges that CDNY “automatically deduct[ed] time for meal breaks when employees [were] performing work during that time.” (Compl. ¶ 3). Second, Mr. Onate alleges that when he clocked in “prior to the start of his scheduled shift . . . his time was rounded and he was compensated as if he began work at 9:00 a.m.” (Compl. ¶ 15). Similarly, he alleges that when he clocked out “after the end of his scheduled shift . . . his time was rounded and he was compensated as if he clocked out at 5:00 p.m.” (*Id.*).

Defendant CDNY plans to make a Motion for Summary Judgment on these claims, as they are readily disproven by CDNY’s contemporaneous payroll and time records. I have enclosed CDNY’s actual time punches for Mr. Onate (**Exhibit 2**), the rounded time punches for Mr. Onate (**Exhibit 3**), and CDNY’s Time and Attendance Policy (**Exhibit 4**). CDNY’s policy is for “[non]-exempt employees . . . to clock out for lunch and back in from lunch using the electronic time

¹ Plaintiff also makes conclusory allegations about common ownership and management. (*See* Compl. ¶¶ 27-28). He appears to conflate the “joint employer” and the “single employer” theories. Under certain statutes, two entities may be a “single employer” based on (1) interrelated operations, (2) common management, (3) centralized control of labor relations, and (4) common ownership.” *Hart v. Rick’s Cabaret Int’l, Inc.*, 967 F.Supp.2d 901, 940 n.16 (S.D.N.Y. Sept. 10, 2013). However, under the FLSA, the joint employer test – and not the single employer test – is used. *See id.*; *see also Griffin v. Sirva Inc.*, 835 F.3d 283, 292 (2d Cir. 2016) (“The joint employer doctrine, along with the ‘single employer’ (or ‘single integrated employer’) doctrines ‘have been developed to allow a plaintiff to assert employer liability **in the employment discrimination context** against entities that are not her formal, direct employer.”) (emphasis added)); *Lopez v. Acme Am. Envtl. Co.*, No. 12-cv-511, 2012 U.S. Dist. LEXIS 173290, at *11-14 (S.D.N.Y. Dec. 6, 2012) (“Under the FLSA, companies that are part of an ‘integrated enterprise’ . . . may nevertheless employ separate people and absent control, are not liable for separate employees . . . Although they allege an ‘integrated enterprise,’ Plaintiffs cannot escape their obligation under the FLSA to allege a relationship of control between the Corporate Moving Defendants and themselves. Allegations of common ownership and common purpose, without more, do not answer the fundamental question of whether each corporate entity controlled Plaintiffs as employees.”).

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keeping system (Paycom). Electronic time records for non-exempt employees will reflect the following: Time clock punches for the beginning and ending time worked each day [and] Time clock punches for meal periods . . .” (Exhibit 4). This practice is reflected in Plaintiff’s actual time punch records, which show him clocking in and out for lunch. (*See* Exhibit 2). As this evidence demonstrates, Plaintiff did not have meal breaks automatically deducted from his weekly hours worked.

This evidence also disproves Plaintiff’s claim that CDNY has an unlawful rounding policy. As Plaintiff concedes in his Complaint, it is lawful for employers to round “employees’ starting time and stopping time to the nearest 5 minutes, or to the nearest one-tenth or quarter of an hour.” 29 C.F.R. § 785.48(b). (*See also* Compl. ¶ 35). Here, CDNY rounds time punches to the nearest quarter of an hour, and not, as Plaintiff alleges, to his scheduled start and stop time. For example, on July 17, 2018, Mr. Onate clocked in at 8:22 a.m. and clocked out at 5:26 p.m. (He also clocked in and out for lunch.) His start and stop times were both rounded to the nearest 15 minutes – 8:15 p.m. and 5:30 p.m. As a result, he was paid for 11 minutes more than he actually worked that day. (*See* Exhibits 1-2). These contemporaneous records demonstrate that Mr. Onate’s time punches were lawfully rounded to the nearest 15 minutes (and not to his scheduled start and stop times).

In his fourth and fifth claims, Plaintiff also alleges that CDNY did not provide him with a wage notice or with wage statements pursuant to Section 195 of the NYLL. (*See* Compl. ¶¶ 39-40, 86-91). However, Mr. Onate did – in fact – receive paystubs and a wage notice upon hire.² A copy of a sample paystub is attached as **Exhibit 5**, and a copy of his wage notice is enclosed as **Exhibit 6**. CDNY plans to make a Motion for Summary Judgment on these claims as well. The evidence demonstrates that there were no violations of Section 195, and since CDNY “made complete and timely payment of all wages due,” Plaintiff cannot pursue claims under Section 195. *See* N.Y. Labor Law § 198(1-b)-(1-d).

Very truly yours,

BOND, SCHOENECK & KING, PLLC

/s/ Katherine McClung

Katherine McClung (KM4150)

cc: Lee S. Shalov, Brett R. Gallaway, Jason S. Giaimo, Arthur J. Robb

² To the extent that Plaintiff purports to bring a claim for an alleged failure to receive pay notices when his hourly rate changed, there is no private right of action for such a claim. *See* N.Y. Labor Law § 195(1-b) (limiting private right of action to where an “employee is not provided within ten business days of his or her first day of employment a notice as required by subdivision one of section one hundred ninety-five of this article”). Moreover, a notice is not required where – as here – the “changes are reflected on the wage statement . . .” N.Y. Labor Law § 195(2).

EXHIBIT 1

NYS Department of State

Division of Corporations

Entity Information

The information contained in this database is current through December 2, 2020.

Selected Entity Name: CARE DESIGN NY, LLC

Selected Entity Status Information

Current Entity Name: CARE DESIGN NY, LLC

DOS ID #: 5120449

Initial DOS Filing Date: APRIL 17, 2017

County: ALBANY

Jurisdiction: NEW YORK

Entity Type: DOMESTIC LIMITED LIABILITY COMPANY

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

CARE DESIGN NY, LLC
8 SOUTHWOODS BOULEVARD
SUITE 110
ALBANY, NEW YORK, 12211

Registered Agent

NONE

This office does not require or maintain information regarding the names and addresses of members or managers of nonprofessional limited liability companies. Professional limited liability companies must include the name(s) and address(es) of the original members, however this information is not recorded and only available by [viewing the certificate](#).

***Stock Information**

of Shares Type of Stock \$ Value per Share

No Information Available

*Stock information is applicable to domestic business corporations.

Name History

Filing Date	Name Type	Entity Name
APR 17, 2017	Actual	CARE DESIGN NY, LLC

A **Fictitious** name must be used when the **Actual** name of a foreign entity is unavailable for use in New York State. The entity must use the fictitious name when conducting its activities or business in New York State.

NOTE: New York State does not issue organizational identification numbers.

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EXHIBIT 2

Lastname	Firstname	InPunchTime	OutPunchTime
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EXHIBIT 4



Policy	Time and Attendance
Department	Human Resources
Effective Date	July 1, 2018
Original Issue Date	July 1, 2018
Latest Revision Date	n/a
Attachments	None
Approval	By: <u>James Moran</u> Date <u>7/1/2018</u> James Moran, CEO

Care Design NY's hours of operation are Monday through Friday from 8:30 am to 5:00 pm but we allow our workforce some flexibility to work within the hours of 7 am to 7 pm. All work schedules are arranged with supervisor approval and any hours worked outside of 7 am to 7 pm requires written supervisor approval and is time limited.

Accurately reporting time worked and leave time (time-off) is the responsibility of each employee. The employees of CDNY must use the Paycom time and attendance system to electronically record their time worked each day.

Altering, falsifying, or tampering with timekeeping records may result in disciplinary action, up to and including termination. Falsification of time includes clocking in while not actually working or clocking in or out from an unauthorized location. All time punches that are done from the Paycom phone app must allow the device GPS location to be turned on. Due to the nature and location of their job, certain non-exempt and exempt employees will use either the Paycom Computer Application or Phone Application to punch in and out for their shifts.

Until CDNY adopts a Working from Home Policy, no employees will be able to work from home, except that any employee who transition to us as of June 30, 2018 working under such a policy and continues to be approved to do so by their supervisor, may continue the arrangement in the interim. No guarantees can be made about the ability to continue such arrangement in the future. It is expected that at the time an employee clocks in, they are ready and able to perform their work duties and they are to clock out immediately upon completion of their work duties. Employees are not allowed to conduct personal business such as errands, shopping, appointments, etc. at any time while working.

Employees will be provided direction and instruction regarding the expectation for recording time worked in orientation and by their direct supervisor.

In the event of an error in recording a punch or failure to punch in and out, employees should submit a punch change request through Paycom with an explanation for the punch change.

Meal Periods

All employees (exempt and non-exempt) are required to take at least a 30-minute lunch per day. Non-exempt employees are required to clock out for lunch and back in from lunch using the electronic time keeping system (Paycom). Electronic time records for non-exempt employees will reflect the following:

- Time clock punches for the beginning and ending time worked each day
- Time clock punches for meal periods
- Use of paid leave (PTO, Holiday, etc.)

Exempt Employees

Employees in a position that is classified by the Fair Labor Standards Act as exempt are paid a bi-weekly salary that does not vary based on hours worked. This is also referred to as “salaried”. Exempt employees are not eligible for overtime pay.

Exempt employees are required to use the Paycom timekeeping system to record their work time. While exempt employees may punch in at the beginning of their workday and out at the end of their work day, it is not necessary to punch in and out for lunch period. It is important to note that a minimum of a 30-minute lunch is required and the span of the work day should be adjusted to provide for a lunch period.

An exempt employee who is absent from work, either because of a scheduled day off or because of unexpected absence, is required to use paid leave time for the normally scheduled number of hours for that day (generally 8). As an exempt employee, there are many times when schedule variation and additional hours worked beyond 40 is needed to meet the demands of the position. Although CDNY does not have a formal comp time policy that counts every hour worked in excess of 40, there is a degree of flexibility and reasonableness applied to schedule flexibility for an hour or two to attend to personal appointments etc. If an exempt employee is requesting a partial-day off, the requirement to use paid leave time applies for requests of a half-day. As such, if less than a half day (less than 4 hrs.) is requested, there is no requirement to use paid leave time as long as the time is made up within the pay period. Exempt employees are required to communicate any schedule variations to their supervisor.

Non-exempt Employees

A non-exempt employee who works more than forty (40) hours in a workweek shall be eligible for overtime on those hours over forty (40) that were physically worked, exclusive of any Paid Time Off hours used in that workweek (such as Holiday, PTO, Jury Duty, Sick leave). Overtime is paid at the rate of one and one-half times the employee’s regular rate of pay or the weighted average of pay in the event of multiple pay rates.

Non-exempt employees are required to punch in and out at the beginning and end of their day as well as to clock out and in for their lunch period. A minimum of a 30-minute unpaid lunch period is required.

Overtime

Time worked includes all time that an employee is required to be physically working for the organization. Time worked is used to determine overtime pay required for nonexempt employees. Overtime is paid at the rate of one and one-half times the employee’s regular rate of pay or the weighted average of pay in the event of multiple pay rates.

The nature of our work requires staff willing to meet the demands for extra time and effort to meet individual needs. Such additional time, when it extends beyond the 40-hour workweek for non-exempt status staff will be compensated by pay at a rate of one and one-half times the regular rate of pay. Overtime is based only on actual hours worked. **All hours worked over scheduled hours should be approved in advance except for unscheduled staffing needs due to emergencies.**

- a) Non-exempt employees are the only employees eligible for overtime pay. A non-exempt employee is one whose position does not meet any of the definitions for exempt classification as provided by Section 13(a)(1) of the Fair Labor Standards Act as defined by Regulations, 29 CFR Part 541. This status is noted in the employee's job description and offer letter.
- b) **Except in emergencies that affect the safety and welfare of individuals and/or staff, overtime for non-exempt employees must have the prior approval of the supervisor.**

Time Not Worked

Pursuant to the Fair Labor Standards Act (FLSA), CDNY does **not** count the following provisions as time worked:

- a) Paid Leave: Approved paid absences, including but not limited to Paid Time Off, Holiday Leave, military leave, jury duty, blood donation time off, NYC Sick time, and voting time off are not counted as "time worked" or "hours worked".
- b) Meal Periods: A minimum of one-half (1/2) hour unpaid lunch period will be provided to all employees working at least a six (6) hour day.

Absenteeism and Tardiness

All employees are expected to be on time for their work day.

If an employee must be late or absent from work because of illness or other reasons, the employee is expected to notify their supervisor as far in advance of the work day as possible, but no later than one hour prior to the beginning of their working day. It is the responsibility of the employee to review with their supervisor any appointments or schedule commitments on their calendar for the day, to ensure that ample coverage is able to be arranged. As such, the employee needs to be available to the supervisor by phone to provide clarification of either the reason for the call-out or answer questions about schedule commitments for the day.

Excessive tardiness and unscheduled absences impact the quality and continuity of services and responsiveness to individuals and families and, also put hardship on co-workers. Employees who have patterns of tardiness and/or unscheduled absence or excessive tardiness and/or unscheduled absences will be subject to disciplinary action.

Timesheet Approval Process

The employee's supervisor will review and approve the time record in accordance with the timeframes established by payroll. Timesheet approval by a supervisor is an important role and supervisors need to ensure that the timesheet is completed in accordance with this policy.

The pay week begins on Sunday at 12:00 am and ends on Saturday at 11:59 pm. Payroll edits may be done at any time in the pay period and are expected to be done as soon as possible after the employee request is made. Generally, timesheets must be approved by 3pm on the Monday following the end of the payroll period. In the event of a Monday holiday or early payroll processing, the timesheet must be approved by 3pm on the Tuesday following the end of the payroll period.

Time Spent Traveling for Work

There are times when employees must drive or travel from one work location to another. In this instance, employees remain on the clock as the travel is part of their workday. Also included in “travel time” is additional time spent traveling to or from an appointment at either the beginning or end of your workday. When the amount of time spent traveling, because of that appointment, is more than your normal commute time, you are eligible to be compensated for the additional time and it should be recorded on your timesheet as travel time.

Below are two examples:

Travel time at the beginning of your day

Mary Jones, Care Manager, has a work location that is 10 miles from her home and it normally takes her 30 minutes to travel to work. Mary needs to meet with an individual at their day program at 9 am and she plans to begin her workday there. Mary must clock in when she arrives at the day program and not prior to that. The day program is 15 miles from Mary’s home and it takes her 45 minutes to get there. This is an additional 5 miles and 15 minutes. Mary should submit a comment to her supervisor for that day to request the additional time for travel and to explain why it is needed.

Mary should log into Paycom and while she is in her timesheet, click “Comment” and enter the following: Please add 15 minutes of travel time. I started my day with a visit with GS at his day program.

Mary’s supervisor will then click on “Hours” and enter “Travel” for .25 into Mary’s timesheet for that day. Mary’s note will continue to appear as the explanation for the additional time.

If Mary drove her vehicle, she is also eligible for mileage reimbursement for the additional miles she traveled to reach the day program. She should submit for the extra 5 miles.

Travel time at the end of your day

Tom Martin, Care Manager, has a work location that is 20 miles from his home and it normally takes him 45 minutes to travel to work. Tom is stopping by an individual’s home on his way home to drop off some paperwork and check in with this individual. Tom will stay on the clock as he is traveling to this individual’s home. The individual lives on the way to Tom’s home and there are no additional miles traveled to stop there. Tom will clock out when he leaves the individual’s home. There is no mileage reimbursement to be paid since the travel to the individual’s home did not cause Tom to drive any additional miles beyond his normal commute home. There is no travel time to be paid because Tom did not incur any additional commute time for his travel home.

The key to whether travel time or mileage is paid is whether the employee incurred additional time or mileage to complete their job for the day. If because of starting or ending their day at an alternate work location, they incurred additional mileage in their commute to or from work, they are paid mileage for those additional miles. If they spent additional time (beyond their normal commuting time) off the clock traveling to or from an alternate work location, then they would receive travel time.

Use of Accrued Leave during Resignation Period

Accrued PTO and Holiday time is paid out upon separation of employment when the employee provides the required notice of resignation to CDNY. This notice must be in writing, either in an email or letter to their supervisor, and/or Human Resources. Non-exempt employees are required to provide three weeks' notice and exempt employees are required to provide four weeks' notice. The date the notice is received by the supervisor or Human Resources is when the notice period begins. During the notice period, PTO and Floating Holiday time is not available for use. For employees covered by the NYC Sick and Safe Leave Act, Sick Leave continues to be available during the notice period. Employees are expected to comply with the requirements of that law.

During the notice period, employees are expected to be working for the full three or four weeks. Any time-off that may be approved would extend the notice period in order to fulfill the above requirement. Time off such as vacation or floating holiday time would be without pay. NYC Sick leave time would be paid during the notice period, however, the "last day of work" would need to be extended by the number of sick leave days taken to meet the three or four week of worktime requirement. Preapproved vacation that occurs during a notice period may continue to be taken however, it will be taken without pay and will require the notice period to be extended to meet the three or four week of worktime requirement. Employees who do not provide the full three or four weeks of notice as time working will forfeit any accrued and unused PTO and Floating Holiday time.

The supervisor of an employee who has provided notice of resignation must ensure compliance with this policy and procedure. Any questions, either by the supervisor or employee, are to be directed to Human Resources.

EXHIBIT 5

Earnings Statement

ANTONIO JR ONATE

Pay Date:	07/27/2018	Company:	0GG92 - CARE DESIGN NY LLC	Emp #:	1871
Period Start:	07/08/2018		8 SOUTHWOODS BLVD SUITE 110	Dept:	20006217 - CM CARE MGR NYC1
Period End:	07/21/2018		ALBANY NY 12211 (646) 491-6497	Pay Basis:	Hourly

	Rate	Hours/Units	Current Period	Year To Date
Earnings				
Regular	24.00	80.00	1920.00	2688.00
Overtime	36.00	2.25	81.00	81.00
Holiday	24.00	0.00	0.00	168.00
Gross		82.25	2001.00	2937.00
W/H Taxes				
Federal W/H(M/0)			124.36	133.71
Medicare			23.24	31.04
Social Security			99.37	132.71
New Jersey State W/H(M/0)			0.00	10.21
New York State W/H(M/3)			62.77	67.43
Deductions				
Dental			86.03	172.06
Medical			312.28	624.56
NY Paid Family Leave			2.52	2.52
NY SDI %			1.20	1.20
Net Pay			1289.23	1761.56
Net Pay Distribution				Voucher No. 2813DD
Direct Deposit Net Check			1289.23	1761.56 A/C:4606
Employee Benefits, Allowances, and Other				
			Current Period	Year To Date
July Floating Holiday - 7 Hours			0.00	14.00
NYC Sick Hours			3.08	4.58
Paid Time Off Hours			7.69	59.13
			YTD Taken	Available
			0.00	14.00
			0.00	4.58
			0.00	59.13

Voucher No. 2813DD

CARE DESIGN NY LLC
460 West 34th Street 12th Floor
NEW YORK, NY 10001

DATE: 07/27/2018

Dept: 20006217

Net Pay: **1289.23**

One Thousand Two Hundred Eighty Nine And 23/100 Dollars

ANTONIO JR ONATE
750 RUTHERFORD AVE
WOODBIDGE, NJ 07095

For Record Purposes Only
****NON-NEGOTIABLE****

EXHIBIT 6



Notice and Acknowledgement of Pay Rate and Payday
Under Section 195.1 of the New York State Labor Law
Notice for Hourly Rate Employees

1. Employer Information

Name:

Care Design NY

Doing Business As (DBA) Name(s):

FEIN (optional):

Physical Address:

8 Southwoods Blvd
Albany, NY 12211

Mailing Address:

Phone:

518-235-1888

3. Employee's rate of pay:\$ ^{24.00} per hour**4. Allowances taken:**☒ None☐ Tips _____ per hour☐ Meals _____ per meal☐ Lodging _____☐ Other _____**5. Regular payday:** Alternating Fridays**6. Pay is:**☐ Weekly☒ Bi-weekly☐ Other**7. Overtime Pay Rate:**\$ ³⁶ per hour (This must be at least
1½ times the worker's regular rate with
few exceptions.)**8. Employee Acknowledgement:**

On this day I have been notified of my pay rate, overtime rate (if eligible), allowances, and designated pay day on the date given below. I told my employer what my primary language is.

Check one:☒ I have been given this pay notice in English because it is my primary language.

☐ My primary language is _____. I have been given this pay notice in English only, because the Department of Labor does not yet offer a pay notice form in my primary language.

ONATE, ANTONIO JR N

Print Employee Name

ee_18715b3a4d0db424b_102325
Antonio Onate Jr.Employee Signature
07/12/2018

Date

Lisa Reese, VP of HR

Preparer's Name and Title

The employee must receive a signed copy of this form. The employer must keep the original for 6 years.

Please note: It is unlawful for an employee to be paid less than an employee of the opposite sex for equal work. Employers also may not prohibit employees from discussing wages with their co-workers.

2. Notice given:☒ At hiring☐ Before a change in pay rate(s),
allowances claimed or payday